

Assessment of Program Effectiveness
City of West Hollywood
FY 2007-2008

Compliance with permit requirements

The City continued to implement all areas of the permit, targeted pollutants of concern, and took additional steps to prevent spills and discharges.

The City's pollutants of concern – bacteria from pet waste, cigarettes from restaurants and bars, toxics and metals from parking lots and streets – continue to be addressed by a variety of methods including daily street sweeping, daily hand pickup of litter, pet waste stations, steamcleaning alleys, mandatory cigarette disposal receptacles at outdoor dining areas, and aggressive code enforcement of excess trash and other NPDES related discharges. The City added 17 more pet waste stations this year for a total of 47 units. The sewer inspection and maintenance project, budgeted at \$480,000 per year, is ongoing.

City Council also formed an Environmental Task Force for input about water conservation, urban run off and other issues. The group will be presenting its recommendations by the end of the year but in its draft form the report addresses permeable surfaces, composting, a ban on plastic bags and enforcement of the polystyrene ordinance, waste reduction and urban runoff. Additionally, Council approved the mandatory green building program for all commercial and residential projects greater than three units; the program requires compliance in areas of irrigation, water use and water efficient landscape. The ordinance also addresses use of low emitting adhesives, sealants, paints and coatings; use of low emitting materials, composite wood and agrifiber products; indoor chemical and pollutant source control; recycled content, formaldehyde free insulation; use of composite wood without urea formaldehyde; no-voc paints on exterior applications and other practices.

In spite of the City's efforts, West Hollywood and other cities in the Ballona Creek watershed received a NOV for bacteria exceedances in the Santa Monica Bay. Due to the City's small contribution of flow and high compliance rates at the one drain the City drains into, West Hollywood does not think it contributes to bacteria exceedances in the Santa Monica Bay. Monitoring in Ballona Creek will provide more information about the origins of bacteria.

Evaluation methods used to determine program effectiveness

One of the most important measures is the monitoring reports for pollutants of concern in Ballona Creek. The City receives monthly report for bacteria levels and also participates in monthly meetings to draft the monitoring plans for bacteria, toxics and metals, and trash. The reports help determine what additional BMPs should be installed, and where.

Locally, a major indicator of the stormwater program effectiveness is the number of citations given by Code Compliance. This year 86 warning letters and

citations were issued. Three businesses continued to have violations after the first citation. All three have had intensive follow-up, including face-to-face meetings with the Director of Public Works, and in one case, a city prosecutor. Two of the three have had no further violations. In the third case, the enforcement process is continuing with referral to a city prosecutor as the next step.

Summary of program strengths and weaknesses

At 1.9 sq miles, the City can be monitored for illegal discharges fairly easily. The Code Compliance division is aggressive about enforcement and other divisions such as street maintenance are well trained to spot problem areas at businesses and construction sites. Constituents are well informed about urban runoff and report problems immediately. Neighborhood Watch groups assist in getting the word out about bacteria from pet waste and identify where additional pet waste stations should be installed. Volunteers from these groups as well as Sheriff's volunteers and code compliance officers distribute biodegradable plastic pet waste bags to dogwalkers.

Weaknesses include a steady turnover of restaurant, bar and hotel management that necessitate continual retraining and monitoring. In the watershed, bacteria exceedances are still occurring in Santa Monica Bay. The new permit may help cities identify problem areas so that overall water quality improves.

Highlights and Accomplishments

1. To address bacteria, more pet waste stations added for a total of 47.
2. Extra training in sanitary sewer overflows for Street Maintenance Supervisor
3. Aggressive Code Compliance efforts, with 86 citations given.
4. Mandatory green building ordinance passed, with toxics reduction and urban runoff measures spelled out.
5. Environmental Task Force of business owners and residents set up to advise Council on environmental issues
6. Filterra BMP added for lot-to-lot commercial development
7. Alternatives to styrofoam/polystyrene added to website
8. Plastic bag ban sent to Council; ordinance to be crafted.

Water quality improvements or degradation in the watershed

All cities in Ballona Creek Watershed were issued NOVs for bacteria exceedances this year. Our city, with others, is working hard to implement all provisions of the current and upcoming permit and to see water quality improvements as a result.

Interagency Cooperation

The City works closely with many agencies to mitigate urban runoff. One of the most effective partnerships is with Culver City and Beverly Hills. The three cities are copermittees on the Used Oil Recycling Grant and work

together as "Westside Cities" to strategically use the funds to protect Ballona Creek.

The City continues to meet each month with other cities in Ballona Creek to implement the Bacteria TMDL Monitoring Plan as well as the Toxics and Metals Plans and craft the Implementation Plans for these pollutants. City staff attends the NPDES educational meetings and Ballona Creek permittee meetings. Additionally, two councilmembers sit on the Santa Monica Bay Restoration Commission to enhance interagency cooperation at the policy making level.

Future Plans to Improve West Hollywood's Program

The City has begun work on an ordinance to ban plastic bags. The outreach to businesses is being coordinated with the City's Economic Development Division and West Hollywood Chamber of Commerce. Since the ban is closely tied to urban runoff and protection of marine life, the outreach will integrate other aspects of pollution prevention including promotion of alternatives to polystyrene.

We expect the new permit to and the General Plan update to further strengthen pollution prevention efforts.

9. Suggestions to improve effectiveness of city's program or County model programs. All interagency meetings would benefit from ongoing attendance and participation of the Regional Water Quality Control Board and environmental groups. Too much time is spent anticipating responses (often incorrectly) from the Board and other stakeholders. The quarterly NPDES outreach meetings are held in Alhambra, inaccessible by public transportation. Suggest the meetings be held in downtown County offices or by webconference. Most information is via powerpoint and the County has the ability to webcast the meetings. Current meetings are not well attended, with consultants representing many cities. This format would reduce pollutants from driving, and increase access to other city divisions – for example, a recent excellent presentation on composting/fertilizer reduction would have been an ideal opportunity for cities' Parks and Recreation, Landscaping, or Council offices. Similar NPDES information exchanges/trainings by EPA are well attended and allow attendees to ask and answer questions about their programs on line.

B. City's level of compliance with Order No. 01-182 (from 1 to 10). 8.

C. Suggestions for improving program reporting and assessment:

The BMP Survey has some proprietary names but sometimes not the overall description of the BMP. Some cities include non-structural BMPs, others do not.